

**Air Pollution Control District
Jefferson County, Ky
13 December 1999**

TITLE V PERMIT SUMMARY

Company: Veterans Administration Medical Center, 800 Zorn Ave. Louisville, KY 40206-1499

Date Received: 10 October, 1995

Date Admin Complete: 9 December, 1995

Date of Draft Permit: 17 October, 1999

Date of Proposed Permit: 17 October, 1999

District Engineer: Eva Addison

SIC Code(s): 8062

NAICS: 62211

EIS#: 0853

Permit #: 93-97-TV

Introduction:

This permit is to be issued according to: (1) District Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements applicable to Veterans Administration Medical Center (VA) and to provide practical methods of determining continued compliance with these requirements. VA is a hospital providing care for military veterans.

Jefferson County is classified as of the date above as an attainment area for lead (Pb), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter (PM), and particulate matter less than 10 microns (PM₁₀); unclassifiable for particulate matter less than 2.5 microns (PM_{2.5}); and is a moderate non-attainment area for ozone.

Application Type/Permit Activity:

☒ Initial Issuance

☐ Permit Revision

☐ Administrative

☐ Minor

☐ Significant

☐ Permit Renewal

Compliance Summary:

[X] Compliance certification signed [] Compliance schedule included
[] Source is out of compliance

I. Source Description

1. **Class I Area Impacts:** This plant is not located in or near a Class I area.
2. **Product Description:** Steam Generation
3. **Overall Process Description:** Natural gas fired boilers with #2 fuel oil as a backup fuel for steam production.
4. **Site Determination:** There are no other facilities which are contiguous or adjacent and under common control.
5. **Emission Unit Summary:**

U1-Three Babcock & Wilcox steam heating boilers, rated heat input capacity of 20 MMBtu/hr each
6. **Fugitive Sources:** There are no fugitive emissions regulated at this facility.
7. **Title V Major Source Status by Pollutant:**

Pollutant	Actual Emissions (tpy) 1998 Data	Major Source Status Based on PTE*
CO	Negligible	No
NOx	3.91	No
SO2	0.9	Yes
PM	Negligible	No
VOC	Negligible	No
Single HAPs >1 tpy		No
Total HAPs	Negligible	No

*Potential to Emit

8. **MACT Standards:** None applicable

9. **Applicable Requirements:**

<input type="checkbox"/> PSD	<input type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP	<input type="checkbox"/> Other
<input type="checkbox"/> NSR	<input type="checkbox"/> NESHAPS	<input checked="" type="checkbox"/> District-Origin	<input type="checkbox"/> MACT

II. Regulatory Analysis

1. **Emission and Operating Caps:** VA hospital is not subject to any plant wide emission or operating caps.
2. **Compliance Status:** VA hospital signed and submitted the compliance certification in its permit application.
3. **Operational Flexibility:** The company may operate Emission U1 under the operating scenarios specified in the Title V permit.
4. **Testing Requirements:** See the Emission Unit section of the Title V permit for any testing requirements.
5. **Monitoring, Recordkeeping and Reporting Requirements:** Monthly fuel usage and purchase records that show heating value, ash and sulfur content for the fuel oil are required to be kept by the company. The company is required to maintain records showing when fuel oil is being combusted and the results of the opacity test.
6. Periodic Monitoring:
 - a. **Opacity:**
 - (1) The weekly visible emissions survey, when #2 fuel oil is being combusted, is adequate for periodic monitoring to demonstrate compliance with the opacity standard. The source is required to perform a Method 9 if visible emissions are observed. Because #2 fuel oil is utilized only during emergency situations and once a year to verify operational capabilities of the equipment, opacity problems are not expected. This emission unit has no history of compliance problems with the opacity standard. The periodic surveys coupled with Method 9 tests, if necessary, is adequate monitoring to assure the source meets its opacity obligations for this emission unit.
 - (2) Periodic monitoring for this emission unit, when natural gas is being combusted, shall consist of fuel type and usage records. The

District has determined this emission unit would not likely violate the opacity standard, therefore, no periodic visible emissions survey or Method 9 test is required when combusting natural gas.

- b. **Particulate Matter:** The potential uncontrolled PM emissions, as calculated using AP-42 emission factors, demonstrate that the PM emission standards specified in District Regulation 7.06 cannot be exceeded when combusting either fuel; therefore, no periodic monitoring is required.
- c. **Sulfur Dioxide:** The potential uncontrolled SO₂ emissions, as calculated using AP-42 emission factors, demonstrate that the SO₂ emission standards specified in District Regulation 7.06 cannot be exceeded when combusting either fuel; therefore, no periodic monitoring is required.

7. Off Permit Documents

The District considers an “off-permit document” as a document on which a source’s compliance with given regulation(s) is contingent or which contains regulatory requirement(s), but is only referenced in a source’s Title V Operating Permit. The designation “off-permit document” shall be made at the District’s discretion, and may include, but not be limited to, documents such as Regulation 1.05 VOC compliance plans, Preventative Maintenance Program (PMP), Management Of Change System (MOCS); or other documents which are too voluminous to place in the permit.

There are no off permit documents associated with this permit.

III. Other Requirements

- 1. **Temporary Sources:** VA hospital did not request to operate any temporary sources.
- 2. **Short Term Activities:** VA hospital did not report any short term activities.
- 3. **Compliance Schedule/Progress Reports:** VA hospital is in compliance with all applicable requirements; therefore, no schedule of compliance or progress reports are necessary.
- 4. **Emissions Trading:** N/A
- 5. **Acid Rain Requirements:** This source is not subject to the Acid Rain Program.
- 6. **Prevention of Accidental Releases 112(r):** VA hospital does not manufacture,

process, use, store, or otherwise handle one or more of the regulated substances, listed in 40 CFR Part 68 Subpart F and District Regulation 5.15, in a quantity in excess of the corresponding specified threshold amount.

7. **Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase out of their use. This rule applies to any facility that manufactures , sells, distributes, or otherwise uses any of the listed chemicals. VA hospital does not use any of the listed chemicals.
8. **Insignificant Activities:** The following activities identified in the Title V permit application have been determined by the District to be insignificant.

Description	Basis	Quantity
Kerosene Storage Tank, less than 250 gallon	District Regulation 2.02, section 2.3.24	1
Diesel Fuel Storage Tank, 250 gallon, vapor pressure less than 10 mmHg at 20°C and 760 mm of Hg	District Regulation 2.02, sections 2.3.9.2 and 2.3.24	1
Laundry Operation, no separate lint collectors, U3	No regulatory emissions	1
Ethylene Oxide Sterilization Chamber, abator integral part of the process, no HAP or TAP emissions, U5	No regulatory emissions	3
Nonhalogenated Cold Solvent Parts Cleaners, equipped with secondary reservoir	District Regulation 2.02, section 2.3.22	various
Ventilation System - Bakeries & Restaurants	District Regulation 2.02, section 2.3.12	2
Lab Ventilating & Exhausting Systems, non-radioactive materials	District Regulation 2.02, section 2.3.11	4
Emergency Relief Vents or Ventilating Systems	District Regulation 2.02, section 2.3.10	various
Brazing, Soldering or Welding Equipment	District Regulation 2.02, section 2.3.4	3
Internal Combustion Engines, Fixed or Mobile	District Regulation 2.02, section 2.2	2
Research & Development (R&D) Activities, potential emissions less than 5 tons per year	District Regulation 2.02, section 2.3.27	3
Fuel Oil Storage Tanks, installed prior to July 23 1984, 20,000 gallon aboveground, vapor pressure less than 10 mmHg at 20°C and 760 mm of Hg, U2	District Regulation 2.02, section 2.3.9.2 and District Regulation 7.02, section 1.20	2